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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 4
ATLANTA FEDERAL CENTER
61 FORSYTH STREET, S.W.
ATLANTA, GEORGIA 30303-3104

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N00204.AR.001433
NAS PENSACOLA
5090.3a

June 17, 1997

4WD-FFB

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Commanding Officer,
Southern Division, NAVFACENGCOM
Attn: Mr. **Bill** Hill (code 1851)
P.O. Box 190010
North Charleston, South Carolina 29419-9010

SUBJ: ~~Draft~~ Proposed Plan
Site 17, Operable Unit '14
Naval ~~Air~~ Station Pensacola
EPA Site ID No.: FL9170024567

Dear Mr. Hill:

The U. S. Environmental Protection Agency (EPA), has completed the review of the above subject document, dated **March 1997**. EPA's comments on the draft version **are** attached.

If you have **any** questions please contact me at (404) 562-8538.

Sincerely,

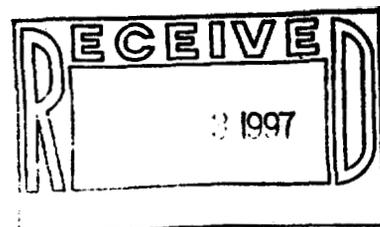
A handwritten signature in black ink, appearing to read "Genia D. Townsend".

Genia D. Townsend

Senior Project Manager
Federal Facilities Branch

Attachment

cc: Ron Joyner, NAS Pensacola
Henry Beiro/Brian Caldwell, Ensafe, Pensacola
Allison Dennon, Ensafe, Memphis
John Mitchell, **FDEP**



Comments

1. The proposed plan is **missing some** basic **statutory** requirements which are **required to be** in such plans. Specifically, the proposed plan does not contain a **summary of site risks, a summary of alternatives, an evaluation of the alternatives, a discussion for each alternative of the nine evaluation criteria, and a discussion of ARARs**. A statement should be added to address the removal action. **“ Upon completion of the soil removal, confirmatory sampling and receiving concurrence from EPA/STATE, the resulting site conditions will be protective of human health and the environment. Therefore, the recommendation for this site is “no action” and the evaluation criteria requirements are not applicable.”** (Example language)
2. The proposed **plan** needs further explanation on why a **full** baseline **risk** assessment **was** unnecessary. **Expand** on how a **risk** threshold evaluation **using** an area-weighted analysis is sufficient in lieu of the baseline risk assessment. Include this information **as** nontechnically **as** possible, (this document is for public review).